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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BIG ROCK ASSETS MANAGEMENT LLC, a
Nevada limited liability company,

Plaintiff,

v.

MTC FINANCIAL INC. DBA TRUSTEE
CORPS, a California Corporation, BANK OF
AMERICA, N.A., a national association; DOES
I-X, inclusive,

Defendants.

Case No.: 2:22-cv-01212-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

(SECOND REQUEST)

Big Rock Assets Management, LLC and Bank of America, N.A. (**BANA**) stipulate that BANA shall have an additional thirty (30) days, up to and including **November 16, 2022**, to file its response to Big Rock's complaint, which is currently due on October 17, 2022.

Good cause exists to grant the requested extension since the parties are engaged in settlement negotiations with respect to this case and other cases pending in the court. *See Big Rock Assets Management, LLC v. National Default Servicing Corporation*, No. 2:22-cv-00909-CDS-DJA; *Big Rock Assets Management, LLC v. National Default Servicing Corporation*, No. 2:22-cv-01543-APG-EJY. The parties are attempting to reach a global settlement and additional time is needed to discuss settlement among multiple counsel, the parties, and other interested entities. Incurring fees related to a response could impact a potential settlement.

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1 This is the parties' second request for an extension of this deadline and is not intended to
2 cause any delay or prejudice to any party.

3 DATED this 11th day of October, 2022.

4 **AKERMAN LLP**

ANDREW BAO & ASSOCIATES

5 /s/ Scott R. Lachman
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10 *Attorneys for Bank of America, N.A.*

11 **IT IS SO ORDERED.**

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14 UNITED STATES MAGISTRATE JUDGE

15 **DATED:** October 13, 2022
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